

## Automated Commercial Environment—Requirements Recommendation

<b>Date:</b>	October 1, 2001
<b>Number:</b>	ACT-005 ePOA
<b>Requestor:</b>	Account Management Subcommittee
<b>Customs Co-Chair:</b>	(signature)
<b>Trade Co-Chair:</b>	(signature)

### Requirement: Electronic Power of Attorney (ePOA)

- a. The Trade requires that ACE provide Power of Attorney functionality electronically ("ePOA"). Client account-owners must have the capability to perform all actions associated with the POA process (drafting, executing/signing, revoking, etc.) electronically via ACE. This is an explicit elaboration of the account relationship example in Paragraph c. of Reqt ACT-001 Account Definition:  
*"c. The Trade must also be able to establish relationships between accounts in different trade roles..., e.g., Broker B is an agent for Importer A, or B has power of attorney to represent A."*
- b. An ePOA is simply an electronic equivalent of today's paper POA, intended to meet legal requirements for agency relationships. While the ePOA should link to and govern ACE account data access and maintenance privileges (e.g. entry filing)\* for those account-owners who utilize the functionality, it is an optional tool. An account may instead choose to continue operating in a paper POA environment. In such instances, no ePOA linking with account privileges is possible and account-owners must explicitly grant all privileges and restrictions via standard ACE access and maintenance procedures\*.
- c. ePOA creation, modification, revocation, etc. must link to and govern ACE account data access and maintenance privileges (e.g. entry filing). All permissions granted or restricted via the ePOA must update the live (transactional) arm of ACE immediately i.e. changes must be reflected REAL TIME.
- d. The ePOA tool must be flexible enough to accommodate customization of items such as effective period, service scope, geographic area and the like. A convenient user interface mechanism such as check-boxes might be used for specifying such permissions and limitations.
- e. Privileges for establishing, modifying and revoking ePOAs will be reserved exclusively to client account-owners. Read-only access for extant ePOAs will be available to the POA grantor and grantee. Revocation or expiration of an ePOA immediately cancels all of grantee's prospective account data maintenance privileges and permits read-only access to historical data.

\* See Account Requirements ACT-002 (Access to Account Data) and ACT-003 (Maintaining Account Data).

NOTE: It is understood that further details and specificity of this and related requirements

must be defined in order to implement a satisfactory solution. The Account Management Subcommittee needs to remain involved during this requirement specification process and expects to provide feedback as refinements emerge. That is, requirements engineering necessarily involves Subject Matter Experts (SMEs), and this Subcommittee is the most relevant and available source of SMEs for account-related matters.

### **Business Need**

The Trade needs to establish, modify and revoke POAs in an efficient and timely manner. The current paper-intensive process is cumbersome, slow, and decentralized, resulting in unnecessary work, delay, and confusion. Further, continued process/system development around outdated paper-only methods is inconsistent with US government mandates favoring electronic documentation/records over paper.

### **Technical Need**

None

### **Benefits**

- a. Electronic POA establishment/maintenance will benefit Customs and the Trade through the elimination of expensive, labor-intensive and time-consuming paper handling.
- b. Electronic validation of POA-authorized transactions, including limitations and revocations, will benefit Customs and the Trade through reduction of erroneous or invalid transactions.
- c. The Trade will be able to ensure the accuracy of POA information, assuming the cost and taking full responsibility for POA accuracy.

### **Risks**

- a. Inadvertently granting transaction maintenance privilege to wrong users
- b. Software/security failure allowing unauthorized transaction submissions/updates

**Related Subcommittees**

Trade Interface, Entry

**Priority:**    **Critical**   ☒                    **High**   ☐                    **Medium**   ☐                    **Low**   ☐**Customs Use Only**Approved   ☐                    Not Approved   ☐                    Further Evaluation Required   ☐